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Attorneys for Defendants
Royce International Broadcasting
Corporation, Playa Del Sol Broadcasters,
Silver State Broadcasting, LLC, Golden
State Broadcasting, LLC, and Edward R.
Stolz, II

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION**

12 W.B. MUSIC, INC., et al

13 Case No. 5:16-cv-00600-JGB-SP

14 Plaintiffs

15 Hon. Jesus G. Bernal

16 v.

17 ROYCE INTERNATIONAL
BROADCASTING INC. et. al.

**DECLARATION OF DONALD
CHARLES SCHWARTZ, ESQ. IN
OPPOSITION TO EX PARTE
APPLICATION FOR WRIT OF
ATTACHMENT; NOTICE OF
BANKRUPTCY**

18 Defendants.

19 **Date: May 5, 2023**

20 **Time: 2:00 p.m.**

21 **Dept: Hon. Jesus Bernal**

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1 I, Donald Charles Schwartz, declare:

2 I am counsel in this action for all defendants herein.

3 I have notified movants' counsel of defendants' opposition to the application for writs
4 of attachment on each of the following grounds:

- 5 1. Defendants are informed and believe that the amounts sought to be collected are pending
6 claims in the United States Bankruptcy Court, District of Nevada in the related Silver
7 State and Golden State bankruptcies.
- 8 2. Defendants have no proposed writs of attachment so it is not known what assets are
9 proposed to be attached. Likely, these are assets under the jurisdiction of the United
10 States Bankruptcy Court, District of Nevada and might be subject to the contempt
11 powers of that Court.
- 12 3. These parties also object because there is no jurisdiction shown for the establishment of
13 this receivership resultant from the Receiver never verifying that he has taken the oath of office
14 as ordered by this Court.

15 I declare under penalty of perjury under the laws of the State of California that the
16 foregoing is true and correct.

17 Dated May 5, 2023.

18 Respectfully submitted,

19 /s/ Donald Charles Schwartz

20 Donald Charles Schwartz, Esq.

21 Associated Attorney for Defendants